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February 20, 2020

VIA ECF

Honorable Vernon S. Broderick, United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

Re: Request for Adjournment of Initial Pretrial Conference  
*Clarke v. Marketaxess Corporation et al.*  
Docket No.: 1:19-cv-06471

Dear Judge Broderick:

This firm represents the plaintiff in the above-captioned matter. The attorneys for plaintiff, Marketaxess Corporation, Marketaxess Holdings Inc., and 3pl Integration LLC have conferred and respectfully submit this joint request for an adjournment of the Initial Pretrial Conference, which is currently scheduled to be held on February 27, 2020. The attorney for defendant Midtown Trackage Ventures LLC filed a stipulation of partial discontinuance without prejudice against it on February 19, 2020.

The conference was adjourned twice before. The first adjournment was at the request of counsel for defendant 3PL Integration LLC, from November 8, 2019 to December 20, 2019. The second adjournment, which was from December 20, 2019 to February 27, 2020, was because it had come to our attention that there may be additional entities should be added as defendants. Additionally, counsel for defendant Midtown Trackage Ventures LLC had submitted various documents for review with a request that the action be discontinued as against it.

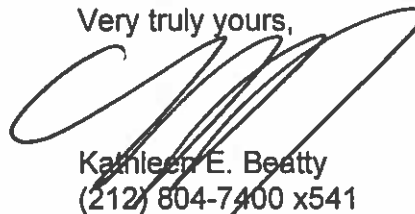
Since the last adjournment, the stipulation of partial discontinuance against Midtown Trackage Ventures LLC was fully executed and filed. Defense counsel provided information that indicates that several additional parties should be joined: Fisher-Park Lane Owner LLC, Fisher Brothers Management Co. LLC, Congruity, Congruity 360, Procurri, MSDI LLC, Fast Fleet Systems Inc., individually and doing business as Fast Fleet JFK, Warren Bainbridge, and/or NICA, Inc. A stipulation to

change parties and amend the caption has been drafted and revisions are currently being discussed. Research into the full and proper names and addresses is ongoing.

To allow reasonable time to complete research, file the amended pleadings, serve the additional parties, obtain answers from the new parties, and include counsel for any new parties at the conference, we request that it be adjourned from February 27, 2020 to April 30, 2020 or May 1, 2020. This would alter the deadline for the submission of the joint letter and proposed Civil Case Management Plan and Scheduling Order, which is currently February 20, 2020. The new deadline will be April 23, 2020 or April 24, 2020, depending on the new conference date. There are no other scheduled dates that will be affected.


We thank the court for its consideration of these issues and our request.

Very truly yours,



Kathleen E. Beatty  
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**APPLICATION GRANTED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.** 2/21/2020

The initial pretrial conference scheduled for February 27, 2020, is adjourned to May 1, 2020. The parties are directed to file their joint letter and proposed Case Management Plan on or before April 24, 2020.